ORIGINAL

ALICIA A.G. LIMTIACO
United States Attorney
MARIVIC P. DAVID
Assistant U.S. Attorney
Sirena Plaza, Suite 500
108 Hernan Cortez Avenue
Hagåtña, Guam 96910
PHONE: (671) 472-7332
FAX: (671) 472-7215

DEC 2 8 2015

JEANNE G. QUINATA CLERK OF COURT

Attorneys for the United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RICHIE R. ESEIN,

Defendant.

CRIMINAL CASE NO. 15-00033

UNITED STATES' MOTION TO FILE UNDER SEAL ITS §5K1.1 MOTION BASED ON DEFENDANT'S SUBSTANTIAL ASSISTANCE

Comes now the United States and moves this Honorable Court for an Order allowing it to file its Motion for Downward Departure under USSG §5K1.1 under seal. The government makes this motion because the §5K1.1 motion explains the reasons that it is seeking a downward departure for defendant. Public disclosure at this time may inadvertently jeopardize ongoing investigations.

RESPECTFULLY SUBMITTED this 18 day of December 2015.

ALICIA A.G. LIMTYACO
United States Attorney
Districts of Guam and NMI

By:

MARIVIC P. DAVID
Assistant U.S. Attorney

16

17

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

18

19 20

21

22

23

24

25

26